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January 11, 2023

By ECF

Honorable Colleen McMahon United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Re: <u>United States v. Leroy Gibbs</u>, 22-CR-534 (CM) SENTENCING MEMORANDUM

Your Honor:

We write on behalf of Mr. Leroy Gibbs, whom this Court will sentence on January 25, 2023. Mr. Gibbs has tarnished a lifetime of hard work and devotion to his family, church, and community by taking bribes for no-bid "micro-purchases" of building maintenance services at the New York City Housing Authority. He is profoundly remorseful; he pled guilty within four weeks of his arrest, and his letter to the Court details his profound shame. His letter, and the letters from his family and friends, paint a vivid picture of his commitments as a father, grandfather, foster parent (of approximately 25 children), friend, and co-worker.

He has already suffered very serious financial and emotional consequences from his conduct. His long and much-loved career at NYCHA has ended in ignominy. He lost his job, and its premature termination for this course of criminal behavior will ultimately reduce his monthly pension payment by approximately \$2500 per month for the rest of his life—a \$30,000 annual reminder of his poor judgment. Given his breach of the public's trust, he knows he deserves this reminder. He is humiliated and understands he must now rebuild his life. Accordingly, we respectfully urge the Court to impose a sentence consistent with the Probation Department's recommendation for time served and community service. Mr. Gibbs's contrition, substantial financial loss, age, personal history, and health weigh strongly in favor of that outcome.

A Lifetime of Hard Work

Mr. Gibbs has provided the Court with a letter, attached here, *see* Exhibit A, that details his remorse and describes his background. We begin with this brief summary:

Mr. Gibbs was born in Brooklyn, New York, in 1964. He notes that he and his older brother, Calvin, lived with their mother, Flostine, in Clinton Hill on the third floor of a four-story building. Mr. Gibbs's paternal grandmother, his mother's twin sister, her family, and another aunt and uncle

lived in that building. His father's absence and his mother's illness marked his childhood, as his father battled heroin addiction and his mother suffered from heart disease, preventing her from working. The family struggled financially, receiving public assistance and help from his grandmother, who worked as a maid.

Mr. Gibbs writes movingly about his father's struggles with heroin and his feelings about his father. Sometimes, when his father came by, Mr. Gibbs and his brother sought refuge in their church to avoid the anger and violence. His father was stabbed and killed by his girlfriend when Mr. Gibbs was entering junior high school. Mr. Gibbs was left with complicated feelings of both grief and relief.

With all those challenges and his youthful fear of losing his mother because of her health problems, Mr. Gibbs's strongest memories are of his mother's loving engagement and support. His mother ensured that her sons did their schoolwork and learned good manners. On Saturdays, they did their chores. On Sundays, the family went to Bethlehem Healing Temple, where Mr. Gibbs sang in the choir, ushered, and attended Sunday school. There were challenges in his childhood, but also a great deal of love.

Having experienced financial hardship as a child, Mr. Gibbs has always valued achieving financial security. He started working as a messenger at fourteen and has worked continuously since then. He left college after two years to begin working full-time, and in April 1986, he was hired as a temporary NYCHA employee to clean parks. That was the beginning of his thirty-five-year career with NYCHA that ended with his arrest in this case.

He became a permanent employee and worked his way up from Janitor to Heating Plant Technician, Maintenance Worker, and Building Resident Superintendent. Throughout his career, he took every opportunity to learn new skills. He obtained licenses and certifications in several subspecialties, including HVAC, sprinklers & standpipes, remediation, pest control, controlling stoppages, electrical, plumbing, and carpentry. The attached letters from Sidney Fair, a Heating Plant Technician (who sadly passed away in December); Thornton Bynum, an NYCHA groundskeeper; Dominic Adeyemo, an NYCHA Mold Specialist; and Kevin Wyatt, a former NYCHA Maintenance Technician, all speak of Mr. Gibbs as a co-worker, supervisor, and mentor who worked hard, listened well, and cared deeply for his colleagues and building residents. *See* attached Exhibit B at 1-6. Whether it was a late-night fix to restore heat to a Senior Center, assisting another with a drinking problem to reach firmer ground, giving trusted advice to a troubled young man, or offering a room to another who needed a place to stay, his commitment to helping others primarily characterized Mr. Gibbs's time at NYCHA.

Ever mindful of his financial obligations and always a hard worker, Mr. Gibbs has supplemented his income with various side businesses. Over the years, he has provided landscaping services, mowing lawns on weekends, and days off. He further uses his building skills to do boiler installations, hang drywall, and do other home maintenance jobs. He has also run a laundry service focused on delivering fresh towels. In addition, he has run several cash businesses over the years and is now reviewing his income tax payments to ensure he is in full compliance.

As he describes in his letter, Mr. Gibbs loves his family. He and his wife, Penny, were married on August 19, 1988. She works for the New York City Department of Corrections. They have two biological children: Leroy Gibbs, Jr., age 35, and Lynaya Gibbs, age 23. Leroy Jr. lives in Tampa, Florida, with his family, and Lynaya continues to live with Mr. and Mrs. Gibbs in their home as she prepares for her career as a nurse. As the PSR notes, his family is aware of his criminal conduct, and "Mrs. Gibbs, who was unable to articulate a motive for her husband's criminal conduct, was at a 'loss for words' and is still 'in shock' regarding her husband's arrest. She repeatedly emphasized that this is an anomaly in her husband's character and described him as compassionate and charismatic, among other things." PSR at 11 (¶ 48).

In 1992, Mr. Gibbs and Penny began to foster children in need. Over the years, they have worked with about twenty-five children. One child in particular, Clyde Ricks, age 30, bonded strongly with them, and the couple adopted him when he was a teenager. Mr. Gibbs calls it "one of the best and most rewarding decisions Penny and I have ever made."

Mr. Gibbs is a devoted and active father to all his kids. He enrolled his sons in various sports, including basketball, baseball, football, and soccer, and coached many of their teams. As a result, he has hundreds of their trophies in his home. In addition, he attended many gymnastics and cheerleading events. More than anything, Mr. Gibbs wanted his children to know he was there for and proud of them. Now in his 59th year, Mr. Gibbs intends to remain present for his children and eight grandchildren. He is looking forward to his daughter's wedding this summer and hopes he can walk her down the aisle.

Mr. Gibbs is an active member of his community. He has wonderfully rich, long-standing friendships that extend back as far as 50 years, as the attached letters from Bryant Anthony Peat, Anthony Ross, Martin Davis, Monfree Wilson, and Leon Winns reflect. *See* attached Exhibit B at 7-13. He attends First Baptist Christian Church, and his wife is a Deaconess. Every morning, he texts friends and relatives a morning prayer. He attends Bible study. *See id.* at 14. He is a member of the Martin Luther King Jr. Lodge 769 in Brooklyn. He donates time and money to help the organization provide services, including helping at soup kitchens and distributing turkeys at Thanksgiving. In addition, he has coached disadvantaged youth in sports for decades. These letters give a fuller view than the conduct at issue here of how Mr. Gibbs has acted when the world is not watching.

Health Concerns

Mr. Gibbs has diabetes, high blood pressure, and asthma. These conditions are currently stable, so long as he is monitored and takes all his medications, which are listed in the Presentence Report. See PSR at 12 (¶ 52). Recently, Mr. Gibbs was diagnosed with benign prostatic hyperplasia. In the past few months, he has undergone several procedures to determine the cause of his high prostate-specific antigen (PSA) levels. See PSR at 12 (¶ 51). However, he is still experiencing blood and clots in his urine and is working with his urologist to find a diagnosis and appropriate treatment. See PSR at 12 (¶ 51) & n. 2. Mr. Gibbs also suffers from major depressive disorder and has seen a licensed therapist every week since October. See PSR at 12 (¶ 53).

Moving Forward

Mr. Gibbs is focused on redeeming himself in the eyes of his family, friends, and neighbors. He pled guilty within weeks of his arrest, paid the total restitution as soon as possible, and reached out to NYCHA colleagues to apologize for letting them down and betraying their trust. He recognizes that his actions have affected each of these relationships and is committed to re-earning their faith. Just as he has supported so many of his friends and family in the past, so have they pledged to help him through this challenging period of his life. In particular, Mr. Gibbs's wife, Penny, has resolutely stood by his side and is committed to backing him whatever his sentence. With that support, he will likely succeed at getting back on track.

Very soon after losing his job at NYCHA, Mr. Gibbs started looking for a job; he could not sit at home. He secured a seasonal position with UPS and a longer-term one with Prince Management, for whom he is completing his training and starting work shortly.

Mr. Gibbs understands the gravity of his legal situation and knows that he must accept his punishment and succeed on supervision. He understands that he must take responsibility for himself. He benefits from family support, which tempers the adverse effects of trauma, as does access to the resources and skills necessary to cope with life's challenges, including his mental health treatment. He is on a promising path and poses little risk of reoffending.

A Downward Variance is Appropriate

This Court has "very wide latitude to decide the proper degree of punishment for an individual offender and a particular crime." *United States v. Cavera*, 550 F.3d 180, 188 (2d Cir. 2008) (*en banc*). 18 U.S.C. § 3553(a) directs the Court to impose a sentence "sufficient, but not greater than necessary" to achieve the goals of sentencing. The Probation Department recommends time served with one year of supervised release, that includes 120 hours of community service. The PSR also offers: "The permanent loss of his cherished established livelihood may be enough punishment. Gibbs has been unduly harsh on himself because of this error in judgment and costly mistake. We want to remind Gibbs of all the altruistic things that he has done during his life, and we imagine that these selfless acts, in conjunction with his familial and community support, will motivate him to again live honestly."

In addition to the significant consequences described in the PSR, Mr. Gibbs has also suffered a financial penalty. This offense required him to retire immediately from NYCHA. He was soon to be promoted and looked forward to working for a few more years, at a higher salary, before retiring. Under the NYCHA pension plan, a retiree's benefits are significantly influenced by compensation and age at the time of retirement. Mr. Gibbs knows that had he not committed this offense, he would have retired in three years, and his pension payments would then have started at about \$6628.00 per month and continued at that level for the rest of his life. Instead, he will receive about \$4132.00 per month. Thus, his course of behavior here will cost him approximately \$2500 per month, or \$30,000 per year, for the rest of his life. That is a substantial penalty that would likely deter others. It is also a penalty that Mr. Gibbs knows he deserves.

We urge that Probation's recommendation here meets 18 U.S.C. § 3553(a)'s dictates.

The first 3553(a) factor is the nature and circumstances of the offense. Mr. Gibbs, a public official, pled to accepting \$2,000 in bribes. This is by no means an insignificant offense, as corruption degrades trust in our public institutions. Mr. Gibbs understands the seriousness of his crime and has repeatedly expressed his tremendous regret for breaching his colleagues' and the public's trust with his extremely poor judgment. He takes responsibility for his actions and looks forward to rebuilding the trust of his family and community.

The statute next focuses on the history and characteristics of the defendant. Mr. Gibbs's challenging childhood and prosperous service life outlined above do not absolve him of responsibility here. Still, any sentence should recognize these obstacles and service, as well as their impact on Mr. Gibbs's and others' lives, respectively.

The statute also requires a sentence that provides just punishment and protects the public from future criminal conduct through general and specific deterrence. As for specific deterrence, Mr. Gibbs's remorse is apparent and profound. Even if he had not lost his thirty-five-year career at NYCHA, Mr. Gibbs would not repeat his offense. He has always taken tremendous pride in others' positive perception of him, is crushed that he has marred that perception, and yet is determined to regain it, one good act at a time. As for general deterrence, since his arrest, Mr. Gibbs and his wife have faced severe financial hardship due to his actions here that will ultimately well outweigh the amount at issue in this case. Mr. Gibbs has already faced punishment for his poor judgment, and a term of incarceration would do little to protect the public from future criminal conduct, given that Mr. Gibbs has a minor criminal history and no means (and no desire) by which to commit his crime again.

Finally, the statute directs the Court to consider whether the imposed sentence will most effectively rehabilitate the defendant. In making this determination, it is important to note "that imprisonment is not an appropriate means of promoting correction and rehabilitation." 18 U.S.C. § 3582(a); *see also Tapia v. United States*, 564 U.S. 319, 326 (2011) (relying upon the statute and holding that sentences may not be lengthened to promote rehabilitation). Further, Mr. Gibbs is committed to restoring his unique relationships, mental health, and family's financial well-being.

Conclusion

For these reasons, we respectfully urge the Court to adopt Probation's recommended sentence. Such a sentence would meet the demands of retribution and deterrence while promoting rehabilitation, avoiding excessive punishment, and recognizing the need to return Mr. Gibbs to his family, so he can get the care he requires and become a productive member of his community.

Respectfully submitted,

/s/
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On the submission:

Katherine Buoymaster Gabrielle Diaz Michael T. Hamilton Isabelle Leipziger Legal Interns

Attachments:

Exhibit A: Mr. Gibbs's Letter to the Court

Exhibit B: Letters in Support of Mr. Gibbs to the Court

cc: **By ECF & Email**

Catherine Ghosh, Esq.
Robert B. Sobelman, Esq.
Assistant United States Attorneys
Southern District of New York

EXHIBIT A

Leroy Gibbs Bay Shore, NY 11706

October 15, 2022

The Honorable Colleen McMahon United States District Court Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: United States vs. Gibbs

Dear Judge McMahon:

I am humiliated and remorseful for greedily accepting a payment from a contractor I hired. It has been an honor to work for the City of New York Housing Authority for over 35 years of my adult life. It has enabled me to raise an incredible family and give back to my community. It pains me greatly to know that my wrongful conduct is a blemish on the system. I understand my behavior impacts taxpayers who ultimately pay the price for illegal behavior like mine. I am humiliated and sorry for my crime. Reflecting on what I did, it was a colossal mistake that will forever tarnish my character as a man of integrity.

I wrongfully and foolishly put the best interest of the Housing Authority aside, which is evident by my actions as outlined in the details of the case. I have also significantly harmed and embarrassed my family and friends. By using my position of authority for personal gain, I have tainted them all, as they share the burden of my actions. I deserve the notoriety; they do not. I have also been a terrible role model for my children, grandchildren, and young adults who have looked up to me. I want to demonstrate the correct thing to do when one makes a mistake by accepting responsibility and standing ready to face the consequences.

I feel genuine contrition and remorse for my actions. I have betrayed the citizens of New York and the residents of the Housing Authority who had trusted in me. My motivations with NYCHA have always been simple and pure from the beginning, only to provide better living conditions for those in the NYCHA communities where I served valiantly for 35 years, assigned to the 3rd largest development in the country, which was extremely challenging.

I thank you, your Honor, for this opportunity to share my story. I hope that you can

appreciate that the case before you represents but one chapter of my life and hope that you consider tempering judgment with mercy in determining my punishment.

Background:

I was born in Brooklyn, on 1964, to Flostine and Calvin Lee Gibbs. They met in a small town called Swan Quarter, North Carolina, and moved to New York. I have an older brother, Calvin Gibbs Jr. My father was a terrible heroin addict, and I never knew him well. He would bounce in and out of our lives, showing up to beat my mother and steal our food stamps. My mother tolerated his behavior out of fear since she was only four feet eleven inches and had congestive heart failure. I remember that we'd always have peanut butter but would run out of jelly whenever he came by as he fed his drug craving.

My mother's health condition prevented her from working. She would run out of breath just walking to the corner store. As a result, we lived off public assistance for food, rent, and general expenses, with some additional support from my grandmother. We went to church at a Baptist church called Bethlehem Healing Temple and stayed there frequently to avoid my father. It was a place of sanctuary for our family.

My mother's medical condition led to frequent heart attacks and the insertion of several pacemakers to keep her alive. I constantly feared losing her because she was my sole sense of security. Despite her frailty, my mother stayed on top of my brother and me to ensure we attended to our studies and had good manners. She was very overprotective, fearful we might turn into our father. We always had food on the table, cleaned clothes, and bathed regularly. Saturday was dedicated to chores, and Sunday to church, where I sang in the choir, ushered, and attended Sunday school. I also engaged in community service projects feeding the underprivileged and did chores in the church, such as taking out the garbage and sweeping and mopping the floors.

We lived in a four-story building with extended family. My paternal grandmother lived on the bottom floor, my aunt (my mother's twin sister), uncle, and cousins lived below us, and another aunt and Uncle lived on the fourth floor. My brother and I were raised by a committee to a large extent. My uncles were massive men who had both served in the Vietnam War, and neither would hesitate to help my mother.

It seems odd that my mother's family lived with my father's mother, but she understood my father's issues and wanted to help care for us. She was the family's primary source of income, working as a maid, and always helping with food, clothing, and gifts come the holidays.

We enjoyed the best holidays and summer barbecues. They still embodied the southern country ways in which they were raised in North Carolina. They'd always surprise Calvin and me with something different on the menu, like raccoon or squirrel.

My mother's parents lived in North Carolina, and we hardly saw them because neither of us could afford to travel frequently. My grandfather was a sheriff who got killed by inmates trying to escape when I was around fourteen. My grandmother had diabetes, sadly leading to the loss of her arm and legs as she withered away.

Education:

I attended PS 46 Elementary school in Brooklyn, about seven blocks from our house. My mother would walk me back and forth to school every single day. We were, thankfully, located in a quality school district. I earned grades of mostly 75-80 and pushed the envelope to make Honor Roll at least once a year. I was reading above grade level in fourth grade, so I transferred four blocks away to PS 111 for the fifth and sixth grades.

I was introverted and didn't have many friends in school since my mother wouldn't let me go to other people's homes until I turned thirteen. We lived across the street from a park, and I'd mostly play baseball, handball, and basketball whenever I wasn't attending to studies or chores. The few children I had as friends from that park became like family to me. We're still friends 40-plus years later, and our children have gone on to play with each other and become lifelong friends.

I went on to play minor league baseball, where we'd have local games and go to places like Connecticut and upstate New York for tournaments. I additionally played in the PSAL basketball league against other neighborhoods.

I attended PS 265, Susan McKinley, for Junior High School, where I continued to earn above-average grades. I played basketball for the school team and began coming out of my remote shell. Many of my friends had fathers in their lives, and I'd get jealous seeing them at the games. My uncles were involved in my life, but it wasn't the same. It's not that I wanted my father to attend; I just wished I had a father more like theirs.

My father was killed when I was entering junior high school. His girlfriend stabbed him in the heart in an incident of domestic violence. I vividly recall hearing the news and wondering if something was wrong with me because I felt much more relief than sorrow. In fact, during one of our last encounters, I briefly fantasized about hitting him as he would do to my mother because of all the abuse he dished out on my mother. I couldn't understand why my mother cried for such a horrible

person when he died. That day, I made a vow that I would always be there for my children. I never wanted to be like him.

I attended George Westinghouse High School through tenth grade, where my grades began to suffer; I didn't believe my father's death had impacted me, but looking back, I can't see how it didn't. Toward the end of tenth grade, I got into an altercation with another student over a woman. His friends jumped into the fight, as did mine, leading to an all-out riot. I entered school at the beginning of eleventh grade and was escorted out, told that the other student and I had been transferred to different schools.

I transferred to Eastern District High School, where I became friends with many people drinking and doing drugs. My grades nosedived to 65-70, as I did likewise. I had to attend a couple of courses in the summer after twelfth grade to graduate in 1983.

I began working as a messenger at age fourteen to help support my family and me. I'd take the train into Manhattan and serve as a foot messenger after school and as a bike messenger during the summer. This job taught me much about personal responsibility as I began caring for all my needs except food and rent.

Early Adulthood:

I had a serious girlfriend named Kim from ages fourteen through nineteen. I genuinely thought we'd get married. In our youthful exuberance and ignorance, we had unprotected sex, and she became pregnant. Her mother insisted that she terminate the pregnancy. I knew we weren't ready to begin a family, but I also grieved going through the process.

I had a brush with the law when I was seventeen or eighteen. A friend of mine got pressured to transport a firearm but was too afraid to do so. He asked if I would help, and I stupidly agreed. I put it in my bag, paid my subway fare, and walked past a police officer with a K-9 dog who began growling. The officer asked to see my bag, and I readily handed it over, prepared to accept the consequences and get arrested.

I enrolled in NYC Technical College with thoughts of becoming an accountant. I wanted to attend college in North Carolina, but we didn't have the money for me to go. My brother graduated from Delaware State, but his tuition had been paid by a man my grandmother dated. He could no longer afford to do that when my time came. I felt disappointed and, admittedly, a bit jealous of my brother.

I lived at home and continued to work full-time as a messenger to pay my bills. The stress of doing both became too much, and I succumbed to the peer pressure of

friends who had a bad influence on me. I quit college after two years and moved to Harlem, living in an apartment with my best friend, Bryant.

Life-Altering Change:

People in Harlem didn't much like the people from Brooklyn. One day, Bryant and I talked to some women, and some local guys started a fight with us. We thought everything was over, but the next day the brother of one of the other individuals came running toward me with a gun. I took off running away from him. I heard a gunshot but kept running as I felt warm liquid dripping down my leg. I didn't stop until I entered and could hide in Central Park. I saw a hole in my side and went to Harlem Hospital. I got fortunate; the bullet went straight through. I met a woman there named Penny, who was aiding patients for a charitable cause. I found her attractive and tried striking up a conversation, but she brushed me off, thinking I was into something terrible because I had been shot.

I called my mother that night and told her I wanted to change my life. She warmly welcomed me back home. We prayed and rejoiced about my change as I felt relieved to be in a more stable environment. Plus, her health was progressively failing. I relished being there to help care for her needs.

I began working seasonally for the New York City Housing Authority (NYCHA) in 1986 and earned a full-time position in 1987. I started my career as a caretaker janitorial, cleaning up the buildings and grounds.

Later that same year, I went to a party with a friend and saw Penny, whom I had seen at the hospital. Unknowing, the person who invited me to the party was also her cousin. I convinced her cousin to set us up on a date. Our relationship flourished quickly, and Penny got pregnant within six months. Our son, Leroy Gibbs Jr, was born in July 1987. Penny and I moved in together and got married in 1988. Penny is a devoutly Christian who is a God-fearing woman, and she has also helped me to stay on the right track as we grew in Christianity together. We had always attended church services, first at the Christian Cultural Center in Brooklyn and then at Morning Star Baptist Church in Queens when we moved to Queens in 1992.

I worked my way up through NYCHA by demonstrating a solid commitment and dedication to the residents and my job. After one year, I got promoted to Heating Plant Technician, servicing boilers, and providing heat and hot water to many residents. I stayed in that position for eight years. Penny worked as a bank teller at Dollar Drydock Savings Bank in the Bronx.

Penny and I began serving as foster parents around 1993. Penny grew up in difficult circumstances like me, and we were motivated to make a difference in the lives of children. Our journey began when we'd take neighborhood children along

with our family on trips to a park, Great Adventure, Coney Island, Rye Playland, or an assortment of beaches, but we knew we wanted to do more. We mainly took in troubled boys and gave them the tender care they required to help them get back on track, which they were highly successful at.

I became a Free Mason in 1992 at the Martin Luther King Jr Lodge 769 in Brooklyn. Our mission as a member of the Mason Lodge is to live a wholesome Godly life and to help others. We have donated time and money to many charities and the Shriners hospital; we have helped at soup kitchens and did special holiday events. We also arranged dances and activities, the proceeds of which have funded various charitable organizations and underprivileged children.

My mother's heart attacks became more frequent and debilitating, so Penny and I moved her to live with us. It got so bad that she had difficulty breathing and taking care of herself, and we had to tend to her as if she was an infant, once again changing her diapers. I took her to the hospital after one horrible episode, and they released her to a rehabilitation facility. She had another massive heart attack a few days later and got rushed back to Mary Immaculate hospital. As I entered her room, it was clear from her eyes that she would pass away. I received that dreaded call only hours afterward. Losing my mother felt devastating, but I still think she's with me daily.

My grandmother died one year later. She was always full of life and the center of attention at every party, even until she passed away at age eighty-three. I remember one family gathering where all the women gathered around my grandmother as she gave details about the best way to keep a man. It was hysterical. She would also share the secret to living a long, vibrant life: drinking lots of water and eating pork. She went to visit family in Virginia and cryptically told them, "I'm not sure if I'll make it back to see you again." She died from a stroke while climbing up the stairs in her home shortly after returning, leaving another gaping hole in my heart.

Moving On:

My daughter Lynaya Flostine Gibbs was born in July 1999 as I continued to advance within the NYCHA. I moved up to maintenance worker and was promoted to Assistant Resident Superintendent. I took many tests and courses through our union, Local 237, to obtain various licenses, including HVAC, sprinkler, standpipe, and number six oil burners. To improve my job, I also earned certifications for mold remediation, pest control, controlling stoppages, and electrical, plumbing, and carpentry. I took advantage of every opportunity.

Penny worked at the Dollar Drydock for about five years and then found a job at Chase Manhattan Bank on Water Street in Manhattan. They closed her department because they were moving that department to Texas. We didn't want to move, so she planned for the closure by taking tests for city employment. She initially became a school safety officer, then a correctional officer.

Penny and I continued as foster parents for thirteen years, having cared for about twenty-five children, until we became leery of having various boys around our daughter Lynaya as she got older. However, we became particularly attached to Clyde Ricks and chose to adopt him. Initially, he was difficult and didn't listen to anyone, but he gradually came around to trusting our family and believing in God as his foundation of life. He grew up in an addiction and crime-ridden family. He had sadly spent time in Sagamore Psychiatric, Creedmoor Psychiatric, and South Oaks for mental health issues and had lingering problems from lead poisoning. Once he understood what a family meant and the importance of having such people in your life who have your best interest at heart, he gradually came around to trusting and accepting our family. We saw his goodness and thought we could make a difference in his life. It was one of the best and most rewarding decisions Penny and I have ever made.

Our sons played basketball, baseball, football, and soccer, while Lynaya enjoyed gymnastics and cheerleading. I coached several of their teams; my children have won over two hundred trophies. I have also sponsored an award for the Most Valuable Player in St. Alban's little league in Queens for years. My children also excelled in school while Penny and I attended all their events and activities. We are so proud of them all.

We moved to Long Island in 2002 and attended First Baptist Christian Church. We go most Sundays, and Penny has served as a Deaconess. Penny switched her job to the Department of Corrections and worked on Rikers Island for the jail. I continued advancing in my career and got promoted to Superintendent about 12 years ago. We also engage in community service and serve as coaches and mentors within our community. Penny and I also strive to help friends, family, and neighbors personally. To that end, we have aided our eighty-four-year-old neighbors with errands and cutting grass. We have cared for Penny's brother Peter as he was growing up; he also stayed with us for several years as we encouraged him to become the best version of himself and not get caught up in the streets. He did just that, and he became an NYC Police officer. We also took in my childhood friend, Bryant, who lived with us for several years. He was a Desert Storm veteran who needed assistance because he had PTSD, had an eye removed, and was seeing a psychiatrist.

Conclusion:

I spent my entire life building a solid reputation of honesty, hard work, and a strong work ethic but succumbed to greed, unraveling a lifetime of effort. It pains me

greatly to know that this awful act of self-sabotage is how people will remember me. However, I own my reprehensible decision to receive payment from a contractor I hired to work for the city.

I realize that part of this process requires making amends and reflection. To that end, I have repaid the amount I wrongfully received, pled guilty to the charges, written this letter to the court, and apologized to my former employer via letter to the Chairperson. Moreover, I have been speaking with my pastor, seeking guidance to understand how I resorted to this foolish, selfish behavior in committing this crime and ensuring that this will never happen again. I had also begun seeing a psychiatrist to understand better how I could do something so self-destructive when I didn't need the money. I will also continue to mentor others so that they will never make the mistakes I have made. I take these things seriously, and I'm so sorry to all. I have asked the Almighty for redemption. I would also like to commit my time to a community outreach program to help others who may be struggling and have made the wrong decision.

I have also greatly disappointed my life partner, Penny. We will struggle financially in the aftermath of this when we should and could otherwise be looking forward to enjoying a comfortable retirement together. I have been actively seeking employment to continue to support my family financially. We have had several additional income sources other than our regular paychecks that have now dissipated due to this situation. I pride myself on being an honest man, so I told my customers about my situation, and they decided to discontinue services with my family. Every weekend we would get up early in the morning to pick up and deliver towels to various hair salons, and nail salons, as well as boutiques around the Long Island area. My family and I would also do various other odd jobs around our community to make extra cash so that we could make ends meet. We have done everything from selling collectible items, and old appliances, lawn work, snow removal, handyman details, installing and demotion of boilers, etc. This was our lifeline for several years all of which has gone away like a cloud of smoke in the air. Even Penny's braiding and styling of women's hair have stopped since my situation came to light. She now must work additional hours at her regular place of employment so that we can maintain the basic function of our home. She is a fantastic individual who has faithfully stood by my side during this harrowing ordeal. I do not deserve to have such a wonderful woman in my life.

My daughter Lynaya has recently graduated and is having a challenging time preparing to become a nurse for the Nursing State Boards Exam, knowing that her father and hero did something he wouldn't normally do. She has ambitions to continue her education in February of 2023. My wrongful act has also impacted my daughter, and of course, I didn't want her to feel this impact and not continue to excel and become the great woman with morals and integrity I raised her to be.

Prayerfully at her wedding in June 2023, I might be able to walk her down the aisle, and she will be proud of me once again.

My mental and physical health has been poor throughout this ordeal. I can honestly say that I've lost myself. I have no desire to eat, no desire to perform self-care, no desire to be around others, and no desire to do the things that once brought me joy. I no longer feel deserving of those such things. I have lost over 30 lbs. since September. I feel so much pain, hurt, and remorse for my actions that it has seemingly exasperated many of my health conditions such as my diabetes and hypertension. Many of my readings have been out of normal range, often leaving me shaky and dizzy with heart palpitations. I also have a history of experiencing preheart attack symptoms that I was treated for at the hospital in the past. Recently, I have started to experience these symptoms again. Furthermore, I have benign prostatic hyperplasia (BPH). I recently had a green light vaporization procedure done on the prostate because my situation became immensely problematic for my health. As of now, this procedure was not as successful as the doctor thought it would be. I had to undergo another biopsy of my prostate to help determine why my prostate-specific antigen (PSA) numbers were high. Thankfully the test results came back benign at this time, but the quest to figure out why the numbers are elevated is ongoing. I know that I am the sole cause of my diminishing health because I allowed such a foolish decision to ruin my life.

Words cannot express again how genuinely sorry I am for betraying the trust of my employer and the residents of NYCHA. I have spent my entire adult life with coworkers, friends, and family in this NYCHA community, making my actions even more regretful. I apologize to them for my behavior, poor representation, and judgment as an employee. There are no excuses, your Honor, just pure regret for my abysmal decision, misdeed, and actions. I promise you this will never happen again in my lifetime. I will be regretful and ashamed of these actions until my last breath. I pray that your Honor can appreciate my lifetime of otherwise unblemished service. Please consider sentencing me leniently so that I may return to my family and continue to rebuild the bonds of love and trust as soon as possible.

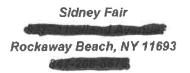
Respectfully,

Leroy Gibbs

Lerry Gibbs

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EXHIBIT B



October 23, 2022

The Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Your Honor,

I have known Leroy Gibbs for over 30 years. We worked together for the N.Y.C. Housing Agency (NYCHA) and have remained close friends ever since. Leroy is a fine man, and I am pleased to offer this letter of support.

He and I worked as Heating Plant Technician (Fixing and maintaining boiler operations) for NYCHA residents. Leroy and I worked together for almost 15 years, often side-by-side. We developed a close friendship, and because our children were about the same age, our families also became very close. Leroy was always very motivational, and I fed off his energy. I have a more reserved nature. Leroy is a hard worker, well-read, informed, and very smart. I am a better man because Leroy influenced my life.

The equipment that we regularly worked on was ancient. Over the years, there were many cold winter nights when we were called to restore heat and hot water to the residents at the developments. Leroy would often help a team even when he wasn't on the clock. He cared about the people in the buildings and never wanted anyone to suffer. I recall when we were having significant problems restoring service to a Senior Center. Leroy heard that we were having difficulties and came to help. He identified the source of the problem, which we found out was behind a basement door. Our supervisors commended me for a well-done job, but Leroy found, located, and fixed the problem. He never said a word because he never looked for accolades; he just wanted to serve the residents.

It was ironic that the day I called him to let him know that I had Stage 4 colon and liver cancer, he had just left me a message to call him back to let me know what had transpired with him too. Leroy is heartbroken over the mess that he has allowed himself to get into by having a lapse in judgment for once. He feels he has let down everyone in NYCHA and his family and friends. He is highly guilt-ridden and has cried to me often while asking for forgiveness. The man I know did

almost everything right, and I assure you he will never do anything of this caliber again. The consequences of this mistake are just too severe. Leroy is strong and is equipped to handle adversity. He did so throughout his entire career at the NYCHA. I know my friend will get through this, and I will continue supporting him as he has always helped me in these trying times I'm going through now. Even though he is going through his problems right now, he still drives over 25 miles to my home to check on me and to take me out for air regularly to give my family a break.

Respectfully,

Sidney Fair

Thorton Bynum

Staten Island, NY 10305

October 28, 2022

The Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Dear Judge McMahon,

Leroy Gibbs and I worked together at NYCHA for over 25 years. I was a groundskeeper. Leroy was a great friend and trusted resource during my entire career.

Leroy is a great family man. He loves his children and always made time to be very involved in all their activities. They have grown up to be fine young adults. Leroy also has a strong faith and always sets a solid moral example to the men he works with. Everyone looks up to Leroy, and those who know him well are not deterred from seeking his advice because of this incident.

Leroy always looked out for me. I have often struggled with issues at work and in my personal life. Several years ago, I had some problems in my marriage that spilled over and affected my work performance. I was likely to get suspended, but Leroy stepped in and spoke to my supervisor. Based on Leroy's recommendation, I retained my job. More importantly, Leroy came alongside me and helped me understand how to be a better husband and avoid future problems in my marriage. Leroy has also helped me with my drinking problem, helping me seek help through the employee assistance program. He has been a great friend.

I have retired for over five years, and I'm an active Deacon at my church. If it wasn't for him constantly talking and directing me in the right direction and to God, I honestly don't know where I would have ended up. I pray for Leroy a lot; he has taught me so much and helped so many men, and I want to support him as much as possible. Thank you for allowing me to submit this letter.

1 1

Sincerely,

Thorton Bynum

October 28, 2022

The Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Dear Judge McMahon,

I met Leroy Gibbs approximately ten years ago. I was 16 years old at the time, and I was playing soccer in Brooklyn. He was walking the track before work, and we started a conversation. Since that time, he has become a valued mentor to me. I am proud to write this letter of support for Leroy. As our relationship developed, I began to look forward to my regular meetings with Leroy. He is so honest and straightforward and an excellent listener. Throughout high school, he gave me valuable insights into everything, including schoolwork, sports, and relationships. His sons are near my age, too, so we all became friends like brothers. When I started college, he was there to help me to think about my career. We worked together for a short time in NYCHA's mold department. He showed me the ropes on how to deal with residents and coworkers.

Just recently, Leroy was at my side for the most challenging event of my life. When I discovered my girlfriend was pregnant, I did not know how to tell my family. I am Nigerian, and my culture and religious upbringing frowned on a child conceived or born out of wedlock. Leroy was the only person I could talk to. He was a calm voice when I needed one. He ended up serving as a mediator between my parents and me. Today, my girlfriend and I are together and excited about the expected birth of our child. My relationship with my parents is as great as ever, and they are excited about a new grandchild. My life would not be the same without Leroy's friendship and mentorship.

Leroy has shared his own stories with me over the years. To have emerged from his background with not much growing up to having a loving family and a long and successful career shows he is resilient. At the same time, my family and I are all saddened and shocked that he is going through this experience. He has expressed that he excepts responsibility for his actions. This is something that he has shown and taught me continuously. Leroy is deeply distressed by the people that his actions have affected. I'm confident he will never be in this type of situation again. I pray that he gets through this and that he can be given a fair opportunity to be restored to his family and our community.

Sincerely,

Dominic Adeyemo

Brooklyn, NY 11207

Kevin Wyatt Virginia Beach, VA 23454

October 24, 2022

The Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Dear Judge McMahon,

I met Leroy Gibbs in 2002 when we worked at the NYCHA. He was an Assistant Superintendent then, and I was a maintenance technician, so he was my direct supervisor. He was a great supervisor, and we became friends as we progressed at the NYCHA. I hope this letter helps him.

I thought, at first, he was very strict with his workers. He set high expectations for quality work. When you did your job well, he fully supported you. He had a tremendous work ethic and was always willing to get in the trenches to help. I respected Leroy from the beginning, which is why we became close friends.

Leroy is a great family man. He always wanted to provide the best for his family, so he was focused on developing his career at the NYCHA. He worked hard enough to be able to invest in some low-income properties, and I helped him time-to-time with needed repairs and renovations to these properties when he was no longer my supervisor. Whether taking care of these properties or our work at the NYCHA, Leroy was committed to the residents. He always wanted them to have pleasant, clean, and adequately working living conditions. He was passionate about helping others.

Leroy has a heart of gold. He would find ways to help his workers when they had personal issues. This included glving them rides to work to the train station at night and adjusting the work schedules for single parents so they could at least take their kids to school or pick them up when needed. He helped me when I was once in a marriable bind; he and his wife allowed me to sleep in the guest room until my wife calmed down; no questions were asked. He has helped people find apartments because he knew of some of the better places in the city because of his volunteer

and lodge connections. Leroy cared about everyone, especially those who worked for and with him.

Leroy is very repentant over this incident. He is hurting deeply inside about all of this that he can't fix now but wishes he could. I spoke to him several days ago and told him to get himself together and become the person he was before this situation, and continually ask for forgiveness from God, the Court, and everyone he has hurt from this incident. I genuinely believe that this will carry him through since he has such a strong faith in God. He states he will make it right by constantly volunteering his time, skills, money, and efforts. One mistake hopefully will not define him for his entire life of good deeds that he has done.

Leroy, me, and several friends are on a group chat. There are about nine of us. Every morning without exception, Leroy sends an inspiring Bible passage. He has been doing this for the last several years now. Amazingly, it always meets a need or challenge one of us faces that day. So even though Leroy is going through this tribulation, his first thought is to help his friends every morning. I am confident that Leroy is like a palm tree in the wind, it bends, but when the wind dies, it stands up straight and strong. Leroy will stand firm again.

Sincerely,

Kevin Wyatt

October 25, 2022

The Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Your Honor,

Since our childhood in Brooklyn, Leroy Gibbs and I have been friends for over 50 years. Leroy is more than a friend to me; he is my brother. My biological brother passed away at a young age, and my family unofficially adopted Leroy as our family. I only know a few men like Leroy. He is kind, compassionate, and trustworthy. He has my full support.

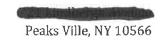
I was an Army Combat Medic and served multiple tours in Iraq and Afghanistan over a long military career. I was physically and emotionally a mess when I came home from my last stint in the Army in 2011. I lost an eye and fingertip and had many other problems. Leroy was the one person I knew I could turn to for support. He opened his home up to me. He helped me financially. I suffered from significant PTSD, and I needed someone to talk to. Leroy was there every day to talk to me. We talked, and we prayed. I am fortunate to have many friends, but very few would do what Leroy has done for me. He is an exceptional man.

Leroy is all about people. We have had great memories in life together, in his backyard, from cookouts to our classic Wiffle ball games, graduations, etc. He is also the Godfather of my three children. He seems to see the good in all; he also somehow sees when someone needs help before they ask; he helps them all, no questions asked. He never seeks anything in return. He genuinely wants to see others do well. Leroy is sickened by this incident because he knows that his lapse of rationality has played a part in this. He is hurt by the people his poor judgment has hurt and affected. He has been humbled and learned a valuable lesson that will drive him to be an even better man. He has constantly called his prior supervisors and asked them to forgive him. He has a great attitude and knows that despite this setback, he is grateful, blessed, and thankful. God has forgiven him, and I pray that this court can extend him the compassion and mercy to forgive him too. I appreciate your consideration of this letter.

Bryant Anthony Peat

Sincerely

Jones, AL 36749



October 22, 2022

The Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Your Honor,

My name is Anthony Ross. I have known Leroy Gibbs for over 45 years, returning to our high school days. We have been close friends ever since. Thank you for this opportunity to write about my friend.

From a young age, Leroy has always had a charismatic personality. He is a "people person" and gets along with everyone. Leroy is also a very generous individual. He is the type of person who would give you his last dollar, even if it meant him going without. He is a dedicated husband, father, and grandfather who has always prioritized his family. Leroy's biological children have grown up to be fine upstanding young adults.

We have a close group of friends from our youth whom we stay in close contact with each other because of Leroy. He is the facilitator who organizes us and the glue that keeps everyone together. We make an annual trip that Leroy sets up and orchestras for us. Last year, one of our close friends in this group passed away. It was during COVID, so it was a tough time for everyone. Leroy helped collect funds from everyone to pay for the memorial service and related expenses. Over the years, others in the group have needed help, a car to drive when theirs was in the shop or a place to stay during a tough time. Leroy is always there to help. He is an incredible friend to so many.

I think of Leroy not as a friend but as a brother. I was extremely saddened to learn he was going through this ordeal. We all make bad decisions and or mistakes, and I must say that for as long as I've known him, he has tried not to make many mistakes, and this is one that he regrets. Leroy has shown great sorrow, hurt, and empathy for his behavior and the people's lives that his behavior has affected. He has spoken to me in detail about this situation and regretfully knows that this has more significant consequences. We often talk,

sometimes for hours, and he is extremely saddened. He will do whatever it takes to amend his mistakes. I hope there will be an option for him to do community service or similar so he can use his job skills and gifts to help others. He is a great mentor to young people, and he could make a positive impact on them. Please give Leroy a fair chance to make this right; I can assure you that this will never happen again. As a part of his family, we will make sure your Honor promises this will never happen again.

Sincerely,

Anthony Ross.

Deerfield Beach, FL 33064

October 26, 2022

The Honorable Colleen McMahon United States District Court Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007-1312

Dear Judge McMahon,

I first met Leroy Gibbs when I was 14, and my family moved to his neighborhood in Brooklyn. We went to high school together and have been close friends ever since.

Since I have known him, Leroy has always been the guy who helps others. I remember when we were in school, and a few kids from the neighborhood were in trouble. Leroy stepped up and called their family to help them. Nobody else at our age would have done that. Leroy was different. Leroy is also a great listener. He is my go-to guy when I have a problem or need advice. He never judges but shoots straight with honest and helpful wisdom. He had stepped up to help my family in many other ways, including when I was in a financial pinch.

Leroy is my daughter's godfather. He has positively influenced her life and always encourages her during good and bad times. She was attending college in Brooklyn when we moved to Florida. She wanted to finish school but had no place to stay. Leroy stepped up and invited her to live with his family while she finished school.

Leroy is keeping a positive attitude during this setback. He is highly repenting and committed to making this situation right by rebuilding lost trust in his co-workers, supervisors, victims, family, and the public. Taking care of his family was always his number one priority, but now he wants to rectify his behavior by trying harder than ever to assist others at any cost. Though his actions were wrong and inexcusable, he admitted that his actions had harmed others and were outright stupid. He has learned from his mistake and will never do anything like this again. I pray that this is a speed bump and does not detour him from doing that and continuing to be the kind and generous man he has always been.

Sincerely,

Martin Davis

Monfree Wilson
Brooklyn, NY 11231

October 26, 2022

The Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Your Honor,

Leroy Gibbs and I grew up in the same neighborhood and went to school together. There is no better man than Leroy.

Since we were kids, Leroy has always cared for others. Growing up, he looked out for me and often protected me from getting myself into challenging situations. We both bought our first homes at about the same time. He brought me to the same realtor from whom he had purchased his home and said he wouldn't stop harassing me until my wife and I found a home. That was one of the best decisions of my life. Leroy is very knowledgeable and taught me how to fix things. Leroy always made time for me.

My first wife got very ill. I had a very unusual work schedule at the time and needed help. Leroy stepped into to help take care of our kids. My wife had many doctor appointments, so Leroy gave me a car to make it easier for us to see these doctors. He would always come over to talk to me to see how I was doing. He helped me keep my mind straight. My wife later passed away; I do not know what I would have done without Leroy's friendship and generosity.

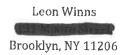
Before my career in Corrections, I bounced around between jobs and struggled financially. On many different occasions, Leroy helped me pay our light bill, gave my family food, and gave my children clothing that his children no longer needed instead of throwing them away. When my son was 14, he got into some legal trouble. Leroy stepped in immediately to get him interested in sports and school. My son later graduated from high school and went to college. He has also

helped my other son get a job with NYCHA. You often don't know your true friends until times get tough. Leroy is a true friend.

Leroy and I have spoken very often about his current problem. He is very remorseful, hurt, and embarrassed by it. He has constantly asked us for forgiveness and prays that the people's lives impacted by this incident don't have to suffer like his family and he are now. He is sincere about his feelings and would like to make things right. He has helped many people like me; he has a massive community of people who will stand by him and support him. I pray he can get a good outcome and move forward from this soon. If possible, please consider this letter.

Thank You,

B-12



October 27, 2022

The Honorable Colleen McMahon United States District Court Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007-1312

Dear Judge McMahon,

I am writing on behalf of Mr. Leroy Gibbs Sr. Leroy and myself have been close friends for over 30 years. He has proven himself to be of good character and responsible during this time. Leroy, a Superintendent for the NYCHA, is known for being a dedicated husband and father.

Leroy is a fellow member of the Masonic organization, Dr. Martin L King Jr. lodge #769. Every year our lodge gives out turkeys to hundreds of families at Thanksgiving. At Christmas, our members donate toys to give to children in hospitals. Leroy has always been active and supported our lodge's charitable activities.

Leroy confessed to me the lack of judgment he exhibited and expressed both remorse and a strong desire to address the personal issues at the heart of the matter. As a friend, I have been aware of some of the challenges he was experiencing in his professional life that led to this poor decision. Leroy has shown a steadfast and resolute demeanor in moving past his mistake constructively in a successful manner.

Leroy has led an honorable life. He will grow from this experience and has expressed a desire to get more active in our lodge's charitable work in our community. I hope this letter will help provide helpful information on Leroy when the court considers this matter.

Respectfully,

Leon Winns

Second Ceremonial Master

Dr. Annie Branch; ThD
Brooklyn, NY 11236

October 22, 2022

The Honorable Colleen McMahon United States District Court Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007-1312

Your Honor,

I, Dr. Annie Branch, have had the most incredible privilege of having known Mr. Leroy Gibbs for the past eight years as part of our Baptist Training Union (BTU) weekly bible study group. But most recently, he came to me about two years ago as a troubled man and asked me to tutor and teach him the Bible more intensively than we were learning. He stated that he wanted to understand better and teach others. He has faithfully been on the BTU study call once, sometimes two times per week; many times, he was driving home from work. He has even gotten on the call while on vacation. I find Mr. Gibbs a man of integrity and a conscientious individual who wants to learn and grow more biblical than others. He is a person you can depend on and is trustworthy. He has been kind and compassionate toward me, and I have seen his reaction toward other people.

When he came to me seeking guidance and mentoring on the bible, I could see his soul was troubled. He would only state that he had done something he wasn't proud of and wanted to confess but was afraid of the consequences. He was nervous about what he did and refused to come forth because he was erroneous. He has recently come forward to reveal what was troubling him for a long time and how he has asked for forgiveness and favor from God. But he understands that his action that particular day has returned to haunt him. Mr. Gibbs is an excellent example of someone who loved and cared for others but has made the biggest mistake of his life and is apologetic. I believe he is a bright star and deserves another chance. I can only pray that God will continue to bless him and his family and keep them together in love and peace. I am so proud and pleased to have the privilege to be a part of his life and write this letter on his behalf.

Sincerely Yours,

Dr. Annie Branch, ThD